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May 9, 2022

By ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007-1312

Re: *Roche Cyrulnik Freedman LLP v. Cyrulnik*, Case No. 1:21-cv-01746 (JGK)

Dear Judge Koeltl:

Pursuant to Rule 6.A.2 of Your Honor's Individual Practices, I write on behalf of Defendant/Counterclaim-Plaintiff Jason Cyrulnik ("Cyrulnik") to request permission to file under temporary seal an exhibit to Cyrulnik's letter in response to Counterclaim-Defendants' May 4, 2022 letter raising a discovery dispute concerning Cyrulnik's initial disclosures. (ECF No. 112.) Cyrulnik intends to reference certain information Counterclaim-Defendants contend are confidential and warrant sealing. Although Cyrulnik does not believe the materials warrant sealing, he makes this request in the interest of affording Counterclaim-Defendants the opportunity to file a motion for longer-term sealing, to which motion Cyrulnik will respond in due course. In accordance with Rule 6.A.2 of your Honor's Individual Practices, we have notified Counterclaim-Defendants of their obligation to file a letter within three days explaining the need to seal the materials.

We thank the Court for its consideration of this request.

Respectfully,



Gavin D. Schryver

cc: Counsel of Record (via ECF)